

## REMARKS

### Claim Changes

Claim 1 is amended to recite “generating...a dynamic seed locally at the client and the network based server” and “generating an application key independently at the client and the network based server corresponding to the locally generated dynamic seed.” Claim 1 is further amended to recite “providing the generated application key to facilitate authenticating an application.” These changes are based at least on FIG. 2 and the accompanying description on page 8, lines 16-21, and page 17, lines 7-13 of the specification as filed. Thus, no new matter is added.

Claim 11 is amended to recite “an authentication unit...generating a dynamic seed locally at the client and the network based server” and to recite “a key manager operable to generate an application key independently at the client and the network based server based on the locally generated dynamic seed.” These changes are based at least on FIG. 2 and the accompanying description in page 8, lines 16-23 of the specification as filed. Thus, no new matter is added.

No amendment made is related to the statutory requirements of patentability unless expressly stated herein. No amendment is made for the purpose of narrowing the scope of any claim, unless Applicant had argued herein that such amendment is made to distinguish over a particular reference or combination of references. Any remarks made herein with respect to a given claim or amendment is intended only in the context of that specific claim or amendment, and should not be applied to other claims, amendments, or aspects of Applicant's invention.

Rejection of claims 1-9 and 11-19 under 35 U.S.C. § 102 (b) as being anticipated by US 5,745,571 (Zuk)

Applicant has amended the claims to clarify the invention. Applicant therefore respectfully requests reconsideration of the rejection of claims 1-9 and 11-19 under 35 U.S.C. § 102 (b) as being anticipated by Zuk as herein amended.

Specifically, independent claim 1, as amended, recites “generating...a dynamic seed locally at the client and the network based server” and “generating an application key independently at the client and the network based server corresponding to the locally generated dynamic seed.” Independent claim 11 recites “an authentication unit...generating a dynamic seed locally at the client and the network based server” and “a key manager operable to generate an application key independently at the client and the network based server based on the locally generated dynamic seed,” which are not anticipated either expressly or inherently in Zuk.

Zuk describes that a random value  $r$  is generated at a smart card (equated to Applicant's client,) and it is transmitted to a Key Generation Center (KGC) (equated to Applicant's server) for producing application, master or authentication key  $K_i$  (equated to Applicant's dynamic seed). At the other end, the KGC produces the Application key  $K_i$  based on the received random value  $r$  and sends back the produced Application key  $K_i$  to the smart card. Finally, the smart card utilizes the received application keys for generating the session keys (equated to Applicant's application keys). Thus, it is clear that the keys are exchanged between the smart card and the KGC for generating application and session keys, and is not generated independently at the smart card and the KGC. See col. 5, lines 8-10, lines 13-15, and lines 23-26 of Zuk. In contrast, Applicant's claim 1, as amended, recites “generating...a dynamic seed locally at the client and the network based server” and “generating an application key independently at the client and the network based server corresponding to the locally generated dynamic seed.” Therefore, Applicant respectfully requests reconsideration of claim 1, as amended, and requests to kindly withdraw the rejection.

Applicant's amended claim 11 recites “an authentication unit...generating a dynamic seed locally at the client and the network based server” and “a key manager operable to generate an application key independently at the client and the network based server based on the locally generated dynamic seed,” which, as discussed above, is not found in Zuk. Therefore, Applicant respectfully requests reconsideration of claim 11, as amended, and requests to kindly withdraw the rejection.

In view of the foregoing, Applicant respectfully submits that Zuk does not disclose Applicant's above mentioned limitation. Applicant therefore submits that independent claims 1 and 11 are not anticipated by Zuk and therefore the rejection of claims 1 and 11 under 35 USC 102(a) is improper and should be withdrawn. Applicant respectfully requests that claims 1 and 11 may now be passed to allowance.

Dependent claims 2-9, and 12-19 depend from, and include all the limitations of independent claims 1 and 11 respectively, which are shown to be allowable for the reasons given above. Therefore, Applicant respectfully submits that dependent claims 1 and 11 are in proper condition for allowance and requests that claims 2-9, and 12-19 may now be passed to allowance.

Rejection of Claims 1-20 under 35 U.S.C. § 102 (e) as being anticipated by US 7,127,613 (Pabla)

Applicant has amended the claims to clarify the invention. Applicant therefore respectfully requests reconsideration of the rejection of claims 1-20 under 35 U.S.C. § 102(e) as being anticipated by Pabla as herein amended.

Specifically, independent claim 1, as amended, recites "generating...a dynamic seed locally at the client and the network based server" and "generating an application key independently at the client and the network based server corresponding to the locally generated dynamic seed." Independent claim 11 recites "an authentication unit...generating a dynamic seed locally at the client and the network based server" and "a key manager operable to generate an application key independently at the client and the network based server based on the locally generated dynamic seed," which are not anticipated either expressly or inherently in Pabla.

Pabla describes that a first peer generates a public key and sends a message including the public key to the second peer. At the other end, the second peer generates a session key based on the received public key. The generated session key is then sent back to the first peer. Thus, it is clear that the keys are exchanged between the first peer and the second peer for generating the

public key and the session key, and is not generated independently at their respective peer. See col. 2, line 61 to col. 3 line 7 of Pabla. In contrast, Applicant's claim 1, as amended, recites “generating...a dynamic seed locally at the client and the network based server” and “generating an application key independently at the client and the network based server corresponding to the locally generated dynamic seed.” Therefore, Applicant respectfully requests reconsideration of claim 1, as amended, and requests to kindly withdraw the rejection.

Applicant's amended claim 11 recites “an authentication unit...generating a dynamic seed locally at the client and the network based server” and “a key manager operable to generate an application key independently at the client and the network based server based on the locally generated dynamic seed,” which, as discussed above, is not found in Pabla. Therefore, Applicant respectfully requests reconsideration of claim 11, as amended, and requests to kindly withdraw the rejection.

In view of the foregoing, Applicant respectfully submits that Pabla does not disclose Applicant's above mentioned limitation. Applicant therefore submits that independent claims 1 and 11 are not anticipated by Pabla and therefore the rejection of claims 1 and 11 under 35 USC 102(e) is improper and should be withdrawn. Applicant respectfully requests that claims 1 and 11 may now be passed to allowance.

Dependent claims 2-10, and 12-20 depend from, and include all the limitations of independent claims 1 and 11 respectively, which are shown to be allowable for the reasons given above. Therefore, Applicant respectfully submits that dependent claims 1 and 11 are in proper condition for allowance and requests that claims 2-10, and 12-20 may now be passed to allowance.

#### Rejection of claims 11 and 13-20 under 35 U.S.C. §101

Claims 11 and 13-20 are rejected under 35 U.S.C. § 101. Claim 11 has been amended to recite “[a] computer readable medium storing programming instructions for operating a system entity to provide authentication services for applications that are running on a client and requiring access to a network based server.” Similarly, dependent claims 12-20 have been

amended to be consistent with claim 11 as amended. The amendments are believed to be within the spirit of the amendments suggested by the Office Action and consistent with conventional computer readable medium claim language. Accordingly, the rejection is believed to be moot. Accordingly, Applicant respectfully requests the rejection be withdrawn.

### Conclusion

Applicant respectfully requests that a timely Notice of Allowance be issued in this case. Such action is earnestly solicited by the Applicant. Should the Examiner have any questions, comments, or suggestions, the Examiner is invited to contact the Applicant's attorney or agent at the telephone number indicated below.

Please charge any fees that may be due to Deposit Account 502117, Motorola, Inc.

Respectfully submitted,  
Chad M. Fors

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